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March 1, 2019  
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary  
Federal Communications Commission  
9050 Junction Drive  
Annapolis Junction, MD 20701

**RE: XConnect Global Networks Limited**  
**EB Docket No. 06-36; CPNI Certification CY 2018**

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2018 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of XConnect Global Networks Limited.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3002 or via email to [cwrightman@inteserra.com](mailto:cwrightman@inteserra.com). Thank you for your assistance in this matter.

Sincerely,

/s/Connie Wightman

Connie Wightman  
Consultant

tms: FCx1901

Enclosures  
CW/im

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification

Covering calendar year 2018

**Name of company(s) covered by this certification:**

**XConnect Global Networks Limited**

**Form 499 Filer ID:**

**828923**

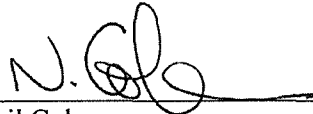
Name of signatory:

Neil Cohen

Title of signatory:

Officer

1. I, Neil Cohen, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. §64.2001 *et seq.*
2. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in §64.2001 *et seq.* of the Commission's rules.
3. The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.
4. The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.
5. The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.



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Neil Cohen

XConnect Global Networks Limited

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Date 1 March 2019

**Attachments:**      Accompanying Statement explaining CPNI procedures

**Attachment A**  
**Statement of CPNI Procedures and Compliance**

**STATEMENT REGARDING OPERATING PROCEDURES  
IMPLEMENTING 47 C.F.R. SUBPART U  
GOVERNING THE USE OF  
CUSTOMER PROPRIETARY NETWORK INFORMATION**

XConnect Global Networks Limited ("XConnect") has established practices and procedures adequate to ensure compliance with Section 222 of the Communications Act of 1934, as amended, and the Federal Communications Commission's ("FCC") rules pertaining to customer proprietary network information ("CPNI") set forth in 47 C.F.R. §§ 64.2001- 64.2011 of the Commission's CPNI rules. This statement summarizes those practices and procedures.

**SAFEGUARDING AGAINST PRETEXTING**

XConnect takes reasonable measures to discover and protect against attempts to gain unauthorized access to CPNI, including the authentication of customers prior to disclosing CPNI based on customer-initiated contacts. The Company will notify the FCC of any novel or new methods of pretexting it discovers and of any actions it takes against pretexters and data brokers.

**TRAINING AND DISCIPLINE**

- XConnect trains its supervisory and non-supervisory personnel in an effort to ensure that its employees, in accordance with FCC regulations: (a) understand what CPNI is; (b) join in and carry-out XConnect's obligation to protect CPNI; (c) understand when they are and when they are not authorized to use or disclose CPNI (d) obtain customer's informed consent as required with respect to its use for marketing purposes; and (e) keep records regarding receipt of such consent, customer complaints regarding CPNI and the use of CPNI for marketing against campaigns.
- XConnect employees are required to review XConnect's CPNI practices and procedures set forth in its training materials.
- XConnect also requires all outside Dealers and Agents to review XConnect's CPNI practices and procedures and to acknowledge receipt and review thereof.
- XConnect has an express disciplinary process in place for violation of the company's CPNI practices and procedures. The careless or intentional failure to comply with these practices and procedures may result in disciplinary action, up to and including discharge.

**XCONNECT's USE OF CPNI**

- XConnect may use CPNI for the following purposes:
  - to initiate, render, maintain, repair, bill and collect for services;
  - To protect its property rights; or to protect its subscribers or other carriers from fraudulent, abusive, or the unlawful use of, or subscription to, such services;
  - To provide inbound telemarketing, referral or administrative services to the customer during a customer initiated call and with the customer's informed consent;
  - To market additional services to customers that are within the same categories of service to which the customer already subscribes.
  - To market services formerly known as adjunct-to-basic services; and

- To market additional services to customers *with the receipt of informed consent via the use of opt-in or out-out, as applicable.*
- XConnect does not disclose or permit access to CPNI to track customers that call competing service providers
- XConnect discloses and permits access to CPNI where required by law (e.g., under lawfully issued subpoena).

## **CUSTOMER APPROVAL AND INFORMED CONSENT**

- XConnect has implemented a system to obtain approval and informed consent from its customers prior to the use of CPNI for marketing purposes. This system also allows for the status of a customer's CPNI approval to be clearly established prior to the use of CPNI.
  - Prior to any solicitation for customer approval, XConnect notifies customers of their right to restrict the use of, disclosure of, and access to their CPNI.
  - XConnect uses opt-in approval when using or disclosing CPNI for purposes other than permitted under opt-out approval or in 47 U.S.C. § 222 and the FCC's CPNI rules.
  - A customer's approval or disapproval remains in effect until the customer removes or limits such approval or disapproval.
  - Records of approvals are maintained for at least one year.
  - XConnect provides individual notice to customers when soliciting approval to use, disclose, or permit access to CPNI.
  - The content of XConnect's CPNI notices complies with Section 64.2008(c) of the FCC's rules.

### **Opt-In and Opt-Out**

- XConnect does not use CPNI for marketing purposes, nor does it disclose CPNI to third parties except where required by law.

### **One time use**

- After authentication, XConnect uses oral notice to obtain limited, one-time approval for use of CPNI for the duration of a call. The contents of such notice comports with Section 64.2008(f) of the FCC's rules.

## **ADDITIONAL SAFEGUARDS**

- XConnect does not use CPNI for marketing purposes and therefore does not maintain records as required by Section 64.2009(c) of the FCC's rules. If this policy changes, XConnect will be sure to comply with all applicable regulations.
- XConnect designates one or more officers, as an agent or agents of the company, to sign and file a CPNI compliance certificate on annual basis. The certificate conforms to the requirements set forth in Section 64.2009(e) of the FCC's rules.
- XConnect will provide written notice to the Commission in accordance with the requirements of Section 64.2009(f) of the FCC's rules if ever its opt-out mechanisms malfunction in the manner

described herein.

- For customer-initiated telephone inquiries regarding or requiring access to CPNI, XConnect authenticates the customer (or its authorized representative), through a pre-established password without prompting through the use of readily available biographical or account information. If the customer cannot provide a password, then XConnect only discloses call detail information by sending it to the customer's address of record, or by calling the customer at the telephone number of record.
- XConnect does not allow customers to access their CPNI online
- XConnect notifies customers immediately of any account changes, including address of records, authentication, online account and password related changes.
- XConnect may negotiate alternative authentication procedures for services that XConnect provides to business customers that have both a dedicated account representative and a contract that specifically addresses XConnect's protection of CPNI.  
In the event of a breach of CPNI, XConnect will notify law enforcement as soon as practicable and no later than seven (7) business days from discovering the breach. As soon as practicable, and in no event later than seven (7) business days after reasonable determination of the breach, XConnect will electronically notify the U.S. Secret Service and Federal Bureau of Investigation through the central reporting facility at [www.fcc.gov/eb/cpni](http://www.fcc.gov/eb/cpni). Customers will be notified after the seven (7) day period, unless the relevant investigatory party directs XConnect to delay notification, or XConnect and the investigatory party agree to an earlier notification. XConnect will maintain a record of all CPNI security breaches, including a description of the breach and the CPNI involved, along with notifications sent to law enforcement and affected customers.

## **OTHER**

- The Company has not taken any actions against data brokers in the past year.
- The Company did not receive any customer complaints about the unauthorized use of CPNI or the unauthorized disclosure of CPNI during calendar year 2018.